

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JOHN R. SKEELS, Individually and on behalf
of all others similarly situated,

Plaintiff,

v.

PIEDMONT LITHIUM INC., KEITH D.
PHILLIPS, BRUCE CZACHOR, and
GREGORY SWAN,

Defendants.

Case No. 1:21-cv-04161-LDH-PK

NOTICE OF NON-OPPOSITION OF ALFRED B. WIECZOREK TO
COMPETING MOTIONS FOR APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF LEAD COUNSEL

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

On September 21, 2021, Alfred B. Wieczorek (“Wieczorek”), by and through his counsel, filed a motion, pursuant to Section 21D(a)(3) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), for the entry of an Order: (1) appointing Wieczorek as Lead Plaintiff on behalf of a class consisting of all persons and entities other than the above-captioned defendants who purchased or otherwise acquired the publicly traded securities of Piedmont Lithium Inc. f/k/a Piedmont Lithium Limited between March 16, 2018 and July 19, 2021, both dates inclusive (the “Class”); and (2) approving proposed Lead Plaintiff’s selection of Pomerantz LLP as Lead Counsel for the Class. Dkt. No. 19.

Having reviewed the competing motions before the Court, it appears that Wieczorek does not have the “largest financial interest” in this litigation within the meaning of the PSLRA. This notice of non-opposition shall have no impact on Wieczorek’s membership in the proposed Class or his right to share in any recovery obtained for the benefit of Class members.

Dated: October 1, 2021

Respectfully submitted,

POMERANTZ LLP

/s/ Jeremy A. Lieberman

Jeremy A. Lieberman

J. Alexander Hood II

600 Third Avenue, 20th Floor

New York, New York 10016

Telephone: (212) 661-1100

Facsimile: (212) 661-8665

ahood@pomlaw.com

jalieberman@pomlaw.com

Counsel for Alfred B. Wieczorek